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J. Pillion

January 10, 2000

Superfund Records Center
SITE 80/90 Bridge Street
BREAK: 1.3
OTHER: 596497

VIA FACSIMILE

Ms. Nancy Smith
U.S. EPA
One Congress Street, Suite 100, HBS
Boston, Massachusetts 02114-2023

Mr. Harish Panchal
Department of Environmental Protection
One Winter Street
Boston, Massachusetts 02108

Re: Draft Site Inspection Report
80/90 Bridge Street, Newton
CERCLIS No. MAD001071034
RACI W.A. No. 032-SISL-01ZZ

Dear Ms. Smith and Mr. Panchal:

We represent Chapel Bridge Park Associates ("Associates"), the owners of the above-referenced property ("Chapel Bridge Park"). By letter dated December 21, 1999 to our client, Tetra Tech NUS, Inc. ("Tetra Tech") sent Associates a draft of a Site Inspection Report for Chapel Bridge Park. The Tetra Tech letter asked for written comments which, if timely filed, may be addressed in the final report. We submit the following comments:

1. At the end of the third full paragraph on page 7, it should be noted that Rizzo concluded that no further remedial action was recommended or required (Comprehensive Site Assessment Report). Rizzo also noted in that Report that since 1987 many mitigating processes (e.g., volatilization, absorption, and natural degradation) may have significantly decreased concentrations of VOCs on site, a point that the results of the 1992 soil gas survey support. *out of scope*

2. At the end of the fourth full paragraph on page 8, a reference should be made to Rizzo's conclusion in the Remedial Response Action Completion Statement filed with DEP that:

Remedial actions have been taken at the Site. A subsequent risk assessment was completed, and the Site conditions were not found to present a significant threat to public health, safety, welfare, or

out of scope

to the environment. The measures taken, therefore, have resulted in there being no identified unacceptable risk of damage to health, safety, public welfare, or the environment during any foreseeable period of time, and these measures constitute a permanent solution as defined in the MCP.

It should also be noted that DEP responded by letter dated September 25, 1997 that the "Department does not anticipate requiring further assessment and/or cleanup at this property [Chapel Bridge Park]."

3. At the top of page 10, the 80/90 Bridge Street property is characterized as being part of a commercial and industrial development. However, on page 7 Tetra Tech acknowledges that Associates renovated 80/90 Bridge Street "for office and commercial use" after 1987, and since that time it has been used for office purposes only. There should be no implication that any industrial use has taken place at 80/90 Bridge Street since 1987. *addressed p. 10 and p. 7*

4. At the bottom of page 10, Tetra Tech notes that the Wellesley wells are 3.9 miles southwest of Chapel Bridge Park and that Chapel Bridge Park is not within the wellhead protection area for the wells. It should also be noted that the groundwater flow from Chapel Bridge Park is away from the Wellesley public wells and that there is no hydrologic connection. *addressed p. 10*

5. At the top of page 14, Tetra Tech states that "groundwater beneath the property has been impacted by a release of hazardous substances." To be fair, Tetra Tech should also state that Rizzo concluded: *out of scope*

The remedial actions taken at the Site, the current information, and the results of the risk assessment indicate that the Site does not pose and is not expected to pose a significant risk of harm to health, safety, public welfare, or the environment over any foreseeable period of time. Thus, the remedial actions taken constitute a permanent solution and therefore no additional remedial response action is necessary.

6. In the first paragraph of section 6.0 on page 14, reference is made to the "probable point of entry (PPE)" to the Charles River for groundwater from Chapel Bridge Park. That "PPE" is noted to be 1,300 feet away from the site. It should also be pointed out that Rizzo found that the "rate of groundwater transport across the Site was calculated by GZA to be approximately 100 feet/year" (Comprehensive Site Investigation). Thus, it would take approximately 13 years for groundwater from Chapel Bridge Park to reach the PPE. During that *out of scope*

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time, as Rizzo noted in reports referenced above, "many mitigating processes" would likely reduce concentrations of certain hazardous materials in groundwater.

7. Table 8 is confusing. The downstream "Types" are not identified. Is there any reason to believe that such types, several miles from the PPE (which itself is 1300 feet away from Chapel Bridge Park), will be impacted by any identifiable release from Chapel Bridge Park? *out of scope*

8. The Summary on page 21 should reflect the points raised above. Specifically, in the second paragraph the fact that there is no connection between the public groundwater wells and groundwater from Chapel Bridge Park should be noted. At the end of that paragraph, it should be pointed out that subsequent extensive remedial efforts at the site and analysis by respected professionals resulted in a finding that no significant risk to health, public welfare, safety or the environment remains and that DEP found that no further investigation or analysis was necessary. In the third paragraph the report should note that it is estimated that groundwater from the site will take 13 years to reach the PPE and that there is no finding of any likelihood that any release from the site will negatively impact receptors downstream from the PPE in the Charles and Boston Harbor. *out of scope*

I hope that the foregoing is helpful in the completion of your report. Should either of you have any questions or comments, please do not hesitate to contact me by phone, letter or e-mail.

Sincerely,


Neal B. Glick

NBG

cc: Chapel Bridge Park Associates